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		First Named Inventor	Kenneth Soohoo
		Art Unit	2672
		Examiner Name	Good-Johnson, Motilewa
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ENCLOSURES (Check all that apply)

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Practitioner's Docket No. 17201.706

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re application of: Kenneth Soohoo

)

Serial No.: 09/261,081

) Group No.: 2672

Filed: 03/02/1999

) Examiner: Good-Johnson, Motilewa

For: Anti-Aliasing System and Method

)

APPELLANT'S REPLY BRIEF

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Dear Sirs:

In response to the Examiner's Answer, mailed February 10, 2004, Appellant hereby presents the Appellant's Reply Brief under 37 C.F.R. § 1.193(b)(1).

ARGUMENT

Appellant has reviewed the Examiner's Answer, mailed February 10, 2004, and believes the appealed claims are allowable. Appellant believes the appealed claims are allowable for the reasons stated in Appellant's Brief, filed October 29, 2003, and Appellant incorporates such arguments herein. Appellant addresses some additional points regarding the Examiner's Answer below.

**I. The Examiner's Answer Provides Insufficient Justification for the Rejection of
Claim 30**

The Examiner has failed to show teaching or suggestion of the invention as claimed in claim 30 in the references. First, the Examiner's Answer has failed to show a teaching of the elements of the invention, even assuming a combination of the references. Next, the Examiner's Answer tries to build up the invention of claim 30 by pointing to unrelated aspects of the references and stating that such aspects equate to the claim elements without establishing any teaching of the claimed relationship of the elements. Finally, the Examiner's Answer provides insufficient reasoning as to the attempted combination of the cited references. It is believed that each of the foregoing deficiencies in the Examiner's Answer highlights an additional reason to reverse the decision of the Examiner rejecting claim 30. These points are discussed in more detail below.

**A. The Examiner's Answer Fails to Show Teaching of the Claimed Elements of Claim
30 in the References**

The Office Action merely stated that claim 30 is rejected based on a similar rationale as other claims. As discussed in Appellant's Brief, such claims are different from claim 30. The Examiner's Answer fails to provide any additional reasoning that would establish a teaching of the invention of claim 30 in the cited references. The Examiner's Answer fails to show reasoning as to how the individual references teach the respective elements of the claimed invention. For example, in pages 3-4 the Examiner's Answer provides an abbreviated list of claim elements, and then discusses aspects of the reference Nishida without showing correspondence between the claim elements and the aspects of Nishida discussed. See, in particular, Examiner's Answer, page 4, lines 1-5. Here the Examiner's Answer makes broad-

brushed statements regarding the reference Nishida without providing reasoning as to how such supposed teaching from Nishida would apply to the claim elements.

Next, the Examiner's Answer refers to another reference, Kumazaki. However, here the Examiner's Answer fails to show clearly what element or elements of the claimed invention would supposedly be taught by Kumazaki. See Examiner's Answer, page 4, lines 6-8.

Thus, even after the discussion of both references, Nishida and Kumazaki, the Examiner's Answer has failed to address various aspects of the claimed invention.

Accordingly, the Examiner's Answer has failed to meet the requirement that “[t]o establish prima facie obviousness of a claimed invention, all the claim limitations must be taught or suggested in the prior art.” See M.P.E.P. 2143.03. The Examiner has failed to establish in the record, through the Office Action or the Examiner's Answer, that the prior art would teach all the elements of the invention as claimed in claim 30.

B. The Examiner's Answer Attempts to Build Up the Invention of Claim 30 from Unrelated Aspects of the References

The Examiner's Answer takes portions of the references out of context to try to build up the invention in a way not taught by the references. For example, Appellant's Brief explained that Nishida does not teach receiving a command to display a shape a particular size, and then to request a bit map rendering of the shape larger than that particular size in the context of a method as claimed in claim 30.

The Examiner's Answer has failed to show such a teaching in Nishida. The Examiner's Answer states that, “Nishida allows for receiving demands for the shape to be enlarged, or larger than a particular size.” Examiner's Answer at page 7, lines 16-18. However, this statement takes the claimed element out of context and does not establish its teaching in the prior art.

Claim 30 refers to receiving a command to display a shape a particular size, and then to request a bit map rendering of the shape larger than the particular size. The Examiner's Answer fails to show a teaching of rendering the shape larger than the particular size, where the particular size is the size that the shape is to be displayed according to the received command. Rather, the Examiner's Answer simply points to a general concept of enlarging shapes. The Examiner's Answer also provides additional discussion regarding supposed teaching of enlargement in Nishida. See Examiner's Answer at page 7, line 21 - page 8, line 4. However, the results of the operations discussed here in Nishida are not used in a method as claimed in claim 30. The Examiner's Answer takes unrelated portions of the reference and tries to build up the invention of claim 30. Thus, the claim includes a number of interrelated steps, and the Examiner's Answer fails to show any teaching or suggestion of the claimed relationship of such steps in the references. Therefore, even if the Examiner is correct in establishing teaching of individual elements of the claim, there has been no establishment of a teaching or suggestion for the arrangement of the elements.

Thus, the Examiner's Answer has failed to address whether the invention "as a whole" would be obvious. See M.P.E.P. 2141.02.

C. The Examiner's Answer Presents Insufficient Reasoning for the Combination of References in the Rejection of Claim 30

The Examiner's Answer presents insufficient reason for the combination of references. The Examiner's Answer states that it would be obvious to include an aspect of the reference Kumazaki in an aspect of Nishida, with only a vague justification: "because in antialiasing vector image processing techniques produce smoother edge portions of output images than in a bit map." See Examiner's Answer, page 4, line 11-13. However, no reasoning has been shown as

to why such a technique should be applied to the disclosure of Nishida. See M.P.E.P. 2143.01 (“The mere fact that the references can be combined does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination.”).

Additionally, even if such teaching of Kumazaki were applied to the teaching of Nishida, the result would not be the invention of claim 30. This is because, as discussed above, Nishida does not teach the other aspects of claim 30. Thus, an application of Kumazaki to Nishida would still lack aspects of the claimed invention. For example, as discussed above, the reference Nishida fails to teach the arrangement of the elements claimed in claim 30. Thus, an application of the teaching of Kumazaki to the teaching of Nishida would still lack such claimed arrangement of elements.

II. The Examiner’s Answer Provides Insufficient Justification for the Rejection of Claim 68

The Examiner has failed to show teaching or suggestion of the invention as claimed in claim 68 and the references. First, the Examiner’s Answer has failed to show a teaching of the elements of the invention, even assuming the combination of the references. Next, the Examiner’s Answer provides insufficient reasoning as to the attempted combination of the cited references. It is believed that each of the foregoing deficiencies in the Examiner’s Answer, even alone, highlights an additional reason to reverse the decision of the Examiner rejecting claim 68. These points are discussed in more detail below.

A. The Examiner’s Answer Fails to Show Teaching of the Claimed Elements of Claim 68 in the References

The Examiner's Answer fails to address teaching of express elements of claim 68, even with the discussion of the Examiner's proposed modification of the reference. First, similarly to the discussion of claim 30, the Examiner's Answer fails to show reasoning as to how the references would teach the respective elements of the claimed invention. For example, on page 6, lines 9-13, the Examiner's Answer merely makes some broad-brushed statements regarding the reference Nishida without showing correspondence between the claim elements and the aspects of Nishida discussed.

Further, the Examiner's proposed modification of Nishida still does not modify Nishida in a way to achieve the invention claimed in claim 68. In the Examiner's Answer, the Examiner admits that "Nishida fails to disclose a cache for storing characters already processed." See Examiner's Answer, page 6, lines 14-15. The Examiner's Answer goes on to say that "[i]t would have been obvious to one of ordinary skill in the art at the time of the invention to include storing processed characters to deliver high-speed operations." See Examiner's Answer, page 6, lines 15-17. The Appellant's Brief discusses reasons that there is no motivation to make such a change to Nishida.

Additionally, this discussion of Nishida in the Examiner's Answer fails to address express limitations of the claim. This discussion in the Examiner's Answer merely addresses including storing processed characters to deliver high-speed operations. However, the Examiner's Answer has failed to establish teaching of the express elements of the claim such as that if a character has already been processed and is available in the cache, displaying the character, and if the character has not already been processed, determining a representation of a character in a bit map having a number of bits greater than the number of pixels in a region of the display device on which the character is to be displayed. Simply adding a cache to Nishida

would not achieve the claimed method with respect to display of characters as claimed in claim 68.

Accordingly, with respect to claim 68, the Examiner's Answer has failed to meet the requirement that “[t]o establish prima facie obviousness of a claimed invention, all the claim limitations must be taught or suggested in the prior art.” See M.P.E.P. 2143.03.

B. The Examiner's Answer Presents Insufficient Reasoning for the Combination of References in the Rejection of Claim 68

The Examiner's Answer states that “[i]t would have been obvious to one of ordinary skill in the art at the time of the invention to include storing processed characters to deliver high-speed operations.” See Examiner's Answer, page 6, lines 15-17. However, no reasoning has been shown as to why such a modification would be applicable to or desirable in the reference Nishida. M.P.E.P. 2143.01 (“The mere fact that the references can be combined does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination.”). The Examiner's Answer also discusses secondary reference Kumazaki regarding improved antialiasing. See Examiner's Answer at page 8, lines 15-20. However, there is no reasoning presented as to why such teaching would motivate one to modify the reference Nishida.

Further, even if the Examiner's proposed modifications to Nishida are made, the invention claimed in claim 68 is still not achieved. As discussed above, Nishida does not yield the invention merely by the addition of a cache. Thus, an application of the Examiner's proposed modification of the reference would still lack the claimed arrangement of the elements of claim 68.

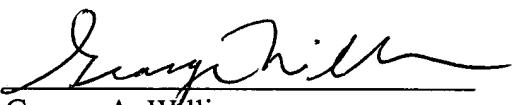
The Examiner's Answer discusses antialiasing and notes that such features are not recited in the rejected claims. Appellant agrees that the feature of antialiasing is not expressly included in the claims, and Appellant does not rely on such feature as a limitation of the claims in Appellant's appeal.

CLOSING

Accordingly, Appellant respectfully submits that the Examiner's rejection is in error and that the claims are allowable over the prior art of record. Further, it is submitted that the present application is in form for allowance and such action is respectfully requested. This paper is submitted in triplicate.

Respectfully submitted,

April 12, 2004
Date

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